



Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington DC 20554

Re: Comments On Eligible Services List For Universal Service Mechanism for  
Schools and Libraries, CC Docket 02-6

Dear Ms. Dortch:

On August 15, 2005, the Federal Communications Commission (FCC) released a Public Notice (FCC 05-158) establishing the comment period for the Funding Year 2006 Eligible Services List. The notice states, "this proceeding is limited to determining what services are eligible under the Commission's current rules; it is not intended to be a vehicle for changing any eligibility rules."

Synovia Corporation hereby recommends that a new service be added to the list of eligible telecommunication services: **Automatic Vehicle Location (AVL)**. A telecommunication service is defined as "the offering of telecommunications for a fee directly to the public, or to such classes of users as to be effectively available, directly to the public, regardless of the facilities used".<sup>1</sup>

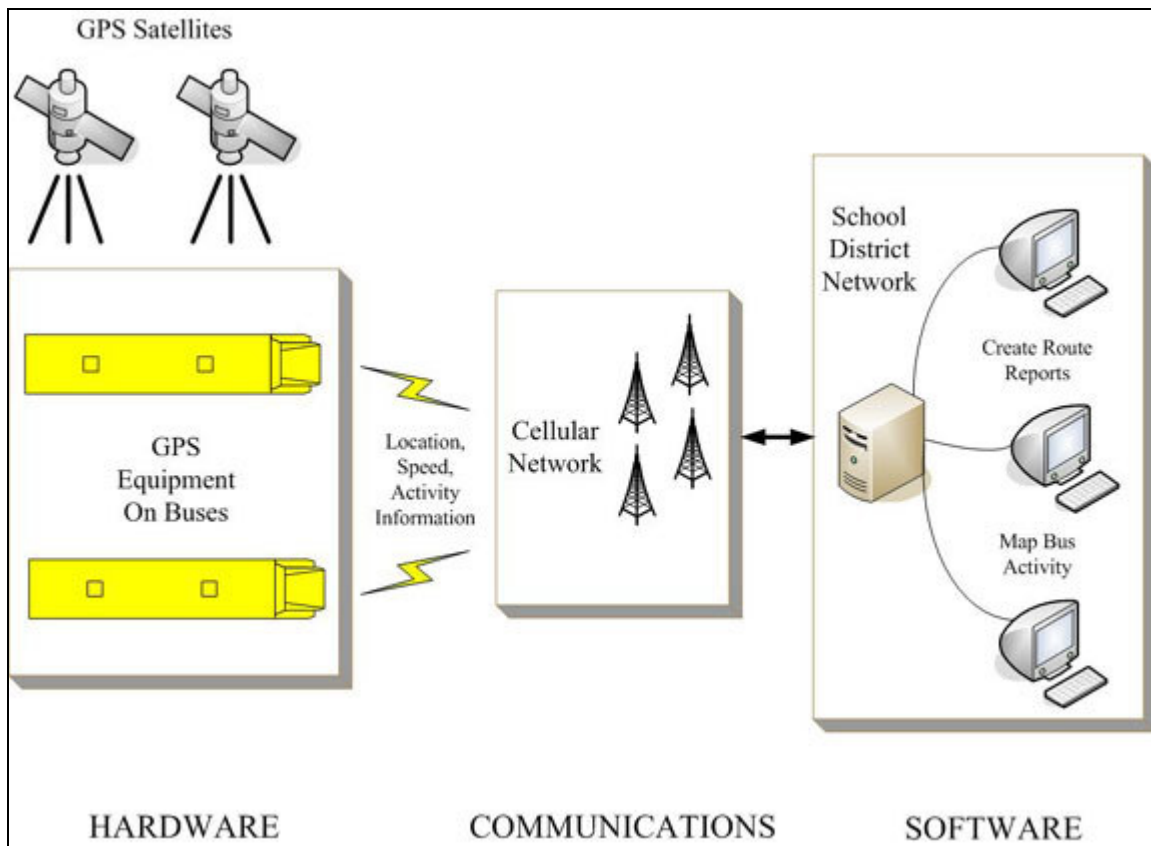
It is our belief that AVL meets all eligibility requirements of a telecommunication service and is integral, immediate, and proximate to the education of students.

## BACKGROUND

Similar to other eligible wireless telecommunication services, including pagers and cellular phones, AVL hardware is used to facilitate real-time communication between school bus drivers and schools/transportation offices. AVL hardware consists of a GPS receiver, cellular modem and associated antennae. This equipment allows bus drivers to transmit positional data while on route, from the school bus directly to the transportation department and schools. Data is sent and received over cellular networks that provide wireless telecommunications on a common carriage basis. The diagram on the following page gives a visual representation of the AVL technology.

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<sup>1</sup> Schools and Libraries' Eligible Services List for Funding Year 2006 – Page 1-2



## INTEGRAL, IMMEDIATE AND PROXIMATE TO THE EDUCATION OF STUDENTS

The benefits of an AVL service are extremely integral, immediate and proximate to the education of students. AVL enables a school district to:

- Reroute a bus immediately during an emergency situation or inclement weather
- Dispatch nearby vehicles in the fleet to assist a bus with mechanical failures
- Optimize bus routes by reviewing collected information
- Allow bus drivers to discretely contact dispatch and local law officials in an emergency through the use of a “panic button”

With AVL technology in place, students can expect shorter rides to and from school, as well during field trips and activity routes. The percentage of on-time arrivals in the district will also increase dramatically. **In short, students will spend less time on the bus and more time in the classroom.**

## OPTIONAL EQUIPMENT

AVL hardware can work in conjunction with various peripheral devices, including but not limited to:

- 1) Student Tracking Mechanisms – provide the time and location students enter/exit buses
- 2) Mobile Data Terminals – provide 2-way text messaging between dispatch and drivers
- 3) Onboard Video Recorders – provide still images inside buses, relayed wirelessly to dispatch or local law enforcement during an emergency

## ELIGIBILITY OF PRIORITY 1 SERVICES OFF-SITE PRECEDENT

According to the Second Report and Order (FCC 03-101, released April 30, 2003), it states,<sup>2</sup>

*“In certain limited circumstances, telecommunications services used offsite may also be eligible. Examples of these eligible uses include a school bus driver’s use of wireless telecommunications services while delivering children to and from school, a library staff person’s use of wireless telecommunications service on a library’s mobile library unit van, and the use by teachers or other school staff of wireless telecommunications service while accompanying students on a field trip or sporting event.”*

Paging and cellular phone services are currently eligible for discount when used by a bus driver who is transporting children to and from school, on field trips and sporting events. AVL hardware offers the same benefit of allowing a bus driver to stay in constant wireless communication with schools and the transportation department. It stands to reason that an AVL service should be added to the category of eligible telecommunication services.

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<sup>2</sup> Paragraph 19 of the Second Report and Order and Further Notice of Proposed Rulemaking in CC Docket No. 02-6, released April 30, 2003



## CONCLUSION

Synovia Corporation urges the Commission to add **Automatic Vehicle Location (AVL)** to the Eligible Services List For Funding Year 2006. The proposed addition could be written as follows:

Automatic Vehicle Location (AVL) Service (Telecommunications)	<p><b>Description:</b> AVL is a service designed to deliver real-time positional data wirelessly from school district vehicles to schools and transportation departments. The service employs cellular radio signals that transmit this information directly to the school district network.</p> <p><b>Eligibility:</b> AVL service is eligible for discount when it is “integral, immediate, and proximate” to the education of students or the provision of services to library patrons. AVL-equipped vehicles involved in delivering students to school, school related activities, and field trips are eligible. The cost of AVL equipment and maintenance of this hardware is not eligible for discount.</p>
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Respectfully Submitted,

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